

The Honorable James L. Robart

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

MICROSOFT CORPORATION, a Washington corporation,

Plaintiff,

V.

MOTOROLA, INC., and MOTOROLA
MOBILITY LLC, and GENERAL
INSTRUMENT CORPORATION.

Defendants.

MOTOROLA MOBILITY LLC, and
GENERAL INSTRUMENT CORPORATION,

Plaintiffs/Counterclaim Defendant.

V

MICROSOFT CORPORATION.

Defendant/Counterclaim Plaintiff:

CASE NO. C10-1823-JLR

**DEFENDANTS' CONSOLIDATED
REPLY TO DEFENDANT'S 10/4/12
MOTIONS TO FILE DOCUMENTS
UNDER SEAL**

**NOTED ON MOTION CALENDAR:
Friday, October 12, 2012**

DEFENDANTS' CONSOLIDATED REPLY TO
DEFENDANT'S 10/4/12 MOTIONS TO FILE DOCUMENTS
UNDER SEAL
CASE NO. C10-1823-JLR

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I. INTRODUCTION

Because Motorola meets the standards for sealing as discussed in the moving briefs (Dkt. Nos. 455 and 460), and because Microsoft (*see* Dkt. No. 466) does not oppose Motorola’s Motion to File Documents Under Seal in Support of Defendants’ Motions in Limine (Dkt. No. 455) or Motorola’s Motion to File Defendants’ Proposed Findings of Fact and Conclusions of Law under Seal (Dkt. No. 460), and offers additional support why Motorola’s Motions should be granted, Motorola respectfully requests that the Court grant the Motions, and seal Exhibits 1-4 and 7-12 to the Declaration of Stuart W. Yothers in Support of Defendants’ Motions in Limine (Dkt. No. 459) and the unredacted versions of Motorola’s Motions in Limine (Dkt. No. 458) and Proposed Findings of Fact and Conclusions of Law (Dkt. No. 462).

DATED this 12th day of October, 2012.

SUMMIT LAW GROUP PLLC

By /s/ Ralph H. Palumbo

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By /s/ Thomas V. Miller

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**DEFENDANTS' CONSOLIDATED REPLY TO
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UNDER SEAL - 1
CASE NO. C10-1823-JLR**

4845-5591-2465.1

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DEFENDANTS' CONSOLIDATED REPLY TO
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UNDER SEAL - 2
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CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED this 12th day of October, 2012.

/s/ Marcia A. Ripley
Marcia A. Ripley

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